

BUCHANAN INGERSOLL & ROONEY PC

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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

KAZI ALAM

CASE NO. 25-2174

Plaintiff,

vs.

CITIBANK N.A.;
EQUIFAX INFORMATION SERVICES, LLC;
EXPERIAN INFORMATION SOLUTIONS, INC.;
and TRANS UNION, LLC,

Defendants.

TRANS UNION, LLC'S NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1331, 1441, and 1446, Defendant Trans Union, LLC ("TransUnion") hereby removes the subject action from the Supreme Court of the State of New York, County of Queens, to the United States District Court for the Eastern District of New York on the following grounds:

1. Plaintiff Kazi Alam ("Alam") is a natural person who resides in Jamaica, New York.

2. Defendant TransUnion is a Delaware corporation with its principal place of business in Illinois.

NATURE OF CASE

3. On March 13, 2025, Alam commenced this action in the Supreme Court of the State of New York, County of Queens, entitled *Kazi Alam v. Citibank N.A., Equifax Information Services, LLC, Experian Information Solutions, Inc., and Trans Union, LLC*, Index Number 707341/2025 via a Summons with Complaint (the “Complaint”). A true and correct copy of the Summons with Complaint is attached hereto as **Exhibit A**.

4. On March 19, 2025, Alam served TransUnion with the Complaint. *See id.* No other process, pleadings, or orders have been served on TransUnion.

5. Alam makes claims under and alleges that TransUnion violated the Fair Credit Reporting Act, 15 U.S.C. § 1681 et seq. (the “FCRA”). *See* Ex. A.

6. This Court has original jurisdiction over the subject action pursuant to 28 U.S.C. § 1331 since there is a federal question. As alleged, this suit falls within the FCRA which thus supplies this federal question.

7. Pursuant to 28 U.S.C. § 1441, et seq., this cause may be removed from the Supreme Court of the State of New York, County of Queens, to the United States District Court for the Eastern District of New York.

8. Removal is timely under 28 U.S.C. § 1446 because this Notice of Removal is filed within 30 days after TransUnion’s receipt of a copy of the Complaint, filed in the Supreme Court of the State of New York, County of Queens.

9. Attached hereto as **Exhibit B** is a copy of TransUnion’s Notice of Filing Notice of Removal to be filed in the Supreme Court of the State of New York, County of Queens, Index Number 707341/2025.

10. Defendants, Experian Information Solutions, Inc. (“Experian”)¹, Equifax Information Services, LLC (“Equifax”) and Citibank N.A. (“Citibank”) have consented to this removal. Attached hereto as **Exhibit C** is a copy of Experian’s, Equifax’s and Citibank’s Consent forms.

11. Notice of this Removal will promptly be filed with the Supreme Court of the State of New York, County of Queens and served upon all parties.

WHEREFORE, Defendant TransUnion, by counsel, removes the subject action from the Supreme Court of the State of New York, County of Queens to this United States District Court, Eastern District of New York.

Date: April 18, 2025

BUCHANAN INGERSOLL & ROONEY PC

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¹ Experian Information Solutions, Inc. has not been served with the Summons and Complaint in this proceeding and does not waive any defenses by consenting to removal.